

BEFORE THE
POSTAL REGULATORY COMMISSION
WASHINGTON, DC 20268-0001

Mail Processing Network
Rationalization Service Changes, 2012

Docket No. N2012-1

PUBLIC REPRESENTATIVE'S FIRST SET
OF INTERROGATORIES AND REQUESTS FOR PRODUCTION TO
UNITED STATES POSTAL SERVICE WITNESS ELMORE-YALCH (PR/USPS-T-11: 1-8)

(January 5, 2012)

Pursuant to 39 CFR 3001.25 through 3001.28, the Public Representative hereby submits the following interrogatories and requests for production of documents. Definitions and instructions included with the Public Representative's First Set of Interrogatories and Requests for Production to United States Postal Service, PR/USPS-1-3 dated December 21, 2011, are hereby incorporated by reference.

The Public Representative encourages the Postal Service to discuss issues of burden, privilege, relevance, or question clarity informally to obviate the need for objections or motions practice.

Respectfully Submitted,

/s/ Christopher J. Laver

Public Representative for
Docket No. N2012-1

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PR/USPS-T-11-1

Please provide focus group transcripts for each customer sector accompanied by any written exercises completed by participants.

PR/USPS-T-11-2

Please refer to page 81 of your testimony, where Appendix D contains an instruction for participants to “write in the number of days they feel are the number of days in transit” of First-Class Mail for destinations in their local area, 200 miles outside of their local area, 200 to 1000 miles outside their local area, and more than 1000 miles outside their local area. How was the term ‘Local Area’ defined for participants?

PR/USPS-T-11-3

Please refer to page 82 part II of Appendix D in your testimony, where it states that a written description of the ‘Five Day Delivery Concept’ was provided to participants. If this statement was not made in error, please explain how a five day delivery concept relates to changes in service standards.

PR/USPS-T-11-4

Please describe the methodology used to gather and/or analyze key points/ideas/opinions from focus group participants?

PR/USPS-T-11-5

Please refer to the file entitled “First-Class Mail_Consumers_Final Data File_USPS-LR-N2012-1.sav”:

- a. Please confirm if blank responses correspond to a refused or “don’t know” answer in column heading “UE_A”?
- b. Under the column heading “Likely_Change” please explain the missing data?
- c. Please identify the specific data fields in the afore-mentioned file used to create Figure 47 on page 52 of your testimony.

PR/USPS-T-11-6

Please refer to the file entitled “First-Class Mail_Consumers_Final Data File_USPS-LR-N2012-1.sav”:

- a. Please confirm if blank responses correspond to a refused or “don’t know” answer in column heading “UE_A”?
- b. Under the column heading “Likely_Change” please explain the missing data?
- c. Please identify the specific data fields in the afore-mentioned file used to create Figure 47 on page 52 of your testimony.

PR/USPS-T-11-7

Please refer to the file entitled "First-Class Mail_Large Commerical_Final_DataFile_USPS-LR-N2012-1.NP1.sav":

- a. Please explain missing data in field names Q3, Q4, Q5A, Q6A, Q7A, Q8A, Q8C, Q9A, Q10A, and Q11A (variable view numbers 54-63)?
- b. Please explain missing data in data columns corresponding to variable numbers 97 – 233?
- c. Please identify variables and/or data fields corresponding to questions Q2A, Q2B, Q2C, Q2D, Q2DD, Q2E, Q2F, and Q2G listed on pages 93-95 of your testimony.

PR/USPS-T-11-8

Please refer to the file entitled "First-Class Mail_SmallHome_Final DataFile_USPS-LR-N2012-1.NP1." Please identify the variables and/or data fields corresponding to questions Q2A, Q2B, Q2C, Q2D, Q2DD, and Q2G listed on pages 122-123 of your testimony.